

Amy Blalock
1001 Gayley Ave #24381
Los Angeles, CA 90024
amyblalock@gmail.com

In Pro Se

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:

AMY LYNNE BLALOCK, an individual;

Debtor,

STEWART LUCAS MURREY, an individual;

Plaintiff,

AMY LYNNE BLALOCK, an individual;

Debtor

Adversary Case No. 24-AP-01152-BR

Bankruptcy Case No. 24-bk-12532-BR

Chapter: 7

**DEFENDANT'S OPPOSITION TO PLAINTIFF
DR. MURREY'S NOTICE AND MOTION TO
COMPEL DEFENDANT MS. BLALOCK'S
RESPONSES TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS AND REQUEST FOR
SANCTIONS; AND DECLARATION OF AMY
BLALOCK**

Hearing Date: December 17th, 2024

Hearing Time: 1:30pm

Courtroom: 1668

Judge: Honorable Barry Russell

I. INTRODUCTION

Plaintiff, Stewart Lucas Murrey, an individual, has claimed to have been in good faith making attempts for discovery. At this point, he has all discovery questions answered. I did not see the plaintiff's emails come in, so they were overlooked. The requests were not mailed to me. Once I received a Meet and Confer (M&C) letter from the plaintiff, I realized my oversight and informed the plaintiff that I would be responding as quickly as I could. As a pro se defendant, I'm learning as I go and have utilized legal aid outlets when I am able to. The plaintiff denied my request for approximately 11 or so days and demanded my responses to his discovery within an unreasonable 24 or so hours.

II. FACTUAL BACKGROUND

Plaintiff's original emails on October 11, 2024 requested the following:

- Form Interrogatories (Set One) with 20 requests;
- Requests for Admissions (RFA) (Set One) with 19 separate requests;
- Demand for Inspection and Production of Documents (Set One) which included 40 requests for production;

While I responded timely and in good faith to the RFA's on November 7, 2024, I did not see his Interrogatories or Demand for Inspection until Plaintiff sent a M&C letter on November 10th, 2024. Included with the plaintiff's M&C letter, he also sent:

- Form Interrogatories (Set Two) with Interrogatories 21-23
- RFA's (Set Two) with requests 20-22

1 -Demand for Inspection and Production of Documents (Set Two) which
2 included demands 41-44

3 When I received the email on November 13th, 2024, I sent the plaintiff a letter through
4 email explaining my oversight and said I could have them done by November 25th, 2024. He
5 responded at 10:53pm demanding that I provide responses to all of his requests no later than
6 November 15th, 2024 which is completely unreasonable. I then replied with another letter that
7 I would try to get them sooner, as I needed to learn how to respond properly. Plaintiff
8 immediately filed a Motion to Compel on November 19, 2024. I was able to complete all of his
9 discovery requests and have them served on November 21, 2024.

10 III. LEGAL ARGUMENT

11 1. THE COURT SHOULD DENY THE MOTION TO COMPEL DEFENDANT AMY 12 BLALOCK'S RESPONSES TO INTERROGATORIES AND REQUESTS FOR 13 PRODUCTION OF DOCUMENTS; AND REQUESTS FOR SANCTIONS

14 I, the defendant pro se, made good faith efforts to to submit all responses as
15 quickly as I could to the Plaintiff and attempted to resolve this issue without court
16 intervention.

17 IV. CONCLUSION

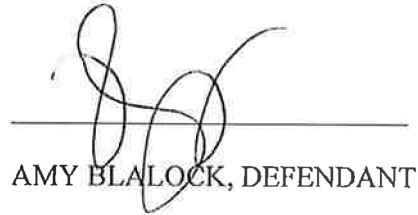
18 Due to the plaintiff's unwillingness to work with me in a reasonable amount of
19 time, the Court should deny the plaintiff's motion to compel and seek sanctions.

V. PRAYER FOR RELIEF

Defendant respectfully requests that this Court deny Plaintiff's Motion to Compel in its entirety. In support thereof, Defendant prays for the following relief:

1. That the Court find that the Motion to Compel lacks merit and is unwarranted under the circumstances;
2. That the Court deny Plaintiff's request for the relief sought in the Motion to Compel;
3. That Defendant be awarded reasonable fees and costs incurred in responding to this Motion, as deemed appropriate by the Court; and
4. Such other and further relief as the Court deems just and proper.

Dated: December 4, 2024


AMY BLALOCK, DEFENDANT
IN PRO SE

Amy Blalock
1001 Gayley Ave #24381
Los Angeles, CA 90024
amyblalock@gmail.com

In Pro Se

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA

In re:

AMY LYNNE BLALOCK, an individual;

Debtor,

STEWART LUCAS MURREY, an individual;

Plaintiff,

AMY LYNNE BLALOCK, an individual;

Debtor

Adversary Case No. 24-AP-01152-BR

Bankruptcy Case No. 24-bk-12532-BR

Chapter: 7

**DEFENDANT'S DECLARATION IN SUPPORT
OF OPPOSITION TO PLAINTIFF DR.
MURREY'S NOTICE AND MOTION TO
COMPEL DEFENDANT MS. BLALOCK'S
RESPONSES TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS; AND REQUEST FOR
SANCTIONS**

Hearing Date: December 17th, 2024

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**DEFENDANT'S DECLARATION IN SUPPORT OF OPPOSITION TO MOTION TO
COMPEL**

I, Amy Blalock, declares as follows:

1. I am the Defendant in this matter. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently thereto.
2. This declaration is in support of defendant's opposition to motion to compel by plaintiff, Stewart Lucas Murrey, and requests for sanctions.
3. I overlooked the plaintiff's emails and asked for 11 days and the plaintiff demanded within 24 hours or so. See Exhibit A. In good faith, I tried to resolve this without court intervention.

4. Objections to the Discovery Requests

The objections I put forth in all discovery requests are due to irrelevance in this case, privacy concerns and overbreadth. I stand by my original responses as listed below.

- INTERROGATORY NO. 22: "State the details concerning any and all monies you received from GoFundMe, including, but not limited to the amount you received, the individual from whom you received said monies, how the total amount of money received was dispersed and who dispersed said monies at what time."
 - i. DEFENDANT RESPONSE : "Object. Not relevant to this case and this interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy."
- INTERROGATORY NO. 23: State and identify the complete name, address, telephone number, email address, social media accounts of any and all anonymous organizers and/or members of the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>

i. DEFENDANT’S RESPONSE “Object. Not relevant to this case and this interrogatory seeks confidential information, which, if disclosed, may constitute an unwarranted invasion of privacy.”

- o DEMAND FOR PRODUCTION NO. 41: Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications concerning the GoFundMe money that you received from the GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. DEFENDANT’S RESPONSE: The responding party is unable to comply with Request No. 41 because it is private financial information.

- o DEMAND FOR PRODUCTION NO. 42: Any and all receipts, documents, documentation, communications, emails, texts, and any and all other communications with the anonymous organizer(s) and/or member(s) of the GoFundMe webpage from which you received money:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. DEFENDANT’S RESPONSE: The responding party is unable to comply with Request No. 41 because it is irrelevant to this case.

- o DEMAND FOR PRODUCTION NO. 44: Any and all messages, text messages, emails and/or communications concerning the removal of Elly Shariat’s story of plaintiff stalking her on your GoFundMe webpage:

<https://www.gofundme.com/f/legal-fund-for-the-women-of-awdtsg-los-angeles>.

i. DEFENDANT’S RESPONSE: The responding party is unable to comply with

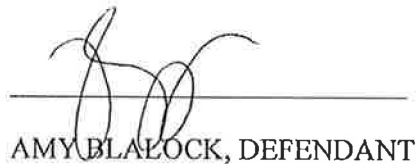
Request No. 44 because I never had aGoFundMe page and Elly Shariat is irrelevant to this case.

5. I made good faith efforts to comply to the plaintiff's request once I realized my oversight and sent a letter in response. See EXHIBIT A. Further, the plaintiff has sent me an egregious amount of emails and as a pro se defendant, I am trying my best to keep up and learn how to properly reply to meet the court's needs.

6. For the reasons stated above, I respectfully request that the Court deny Stewart Lucas Murrey's Motion to Compel.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 4th, 2024, in Los Angeles, CA



AMY BLALOCK, DEFENDANT

IN PRO SE

EXHIBIT A

Amy Blalock, Defendant, Pro Se

1001 Gayley Ave #24381

Los Angeles, CA 90046

amyblalock@gmail.com

Stewart Lucas Murrey, Plaintiff

1217 Wilshire Blvd. # 3655

Santa Monica, CA 90403

November 13, 2024 (sent via email to servingpapers@protonmail.com and 2@lucasmurrey.io)

Re: UPDATED RESPONSE to M&C letter titled: **Dr. Murrey v. Ms. Blalock; Adversary Case No.: 24-ap-01152-BR Failure of Defendant Ms. Blalock to Respond to Plaintiff Dr. Murrey's Discovery Requests and Interrogatories**

Dear Mr. Murrey,

I am writing to inform you that I was unable to respond to the Interrogatories and Discovery Requests within the 30 days as I was inundated with emails and did not see yours come through, I also never received physical mail concerning this. In checking my emails this morning, I received an email from you in the State case. While there is still a 'Stay' in place in the State case, do not email me about that case. I can get the transcripts from our hearing in the State court when the judge asked if I would accept emails from you and I said 'no', so you are in violation of my request in that case.

I would like to keep this as efficient as possible and I understand the importance of adhering to deadlines in this matter, as I have consistently done during this case. As a pro se defendant, I do not know the legal deadlines for all of these things you are asking of me but I have been diligently attempting to learn the law at the level of experience you have in doing this.

I am currently working to gather the necessary information and will promptly provide the responses to the interrogatories as soon as possible. I appreciate your understanding why I need an extension to submit the responses. I will ensure that the responses are complete and submitted no later than November 25, 2024.

Signed,


Amy Blalock

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd. # 3655
Santa Monica, CA 90403
Tel.: (424) 278-3017
Email: 2@lucasmurrey.io
Websites: sickoscoop.com/lucas,
lucasmurrey.com

13 November 2024

Via Email (Sent as a Scanned Copy of the Signed Document) to:

Ms. Amy Blalock
1001 Gayley Ave. # 24381
Los Angeles, CA 90024
Tel. (310) 569-6182
amyblalock@gmail.com

Re: Dr. Murrey v. Ms. Blalock; Adversary Case No.: 24-ap-01152-BR
**Second Meet & Confer Letter Re: Failure of Defendant Ms. Blalock to Respond to
Plaintiff Dr. Murrey's Discovery Requests and Interrogatories**

Dear Ms. Blalock,

I am in receipt of your response today 13 November 2024 to my meet and confer letter from 10 November 2024. It is clear that you are frivolously delaying your responses to my interrogatories and requests for production of documents. As you are aware, our judge seeks to move this case forward quickly and one of the names for the central district is "the rocket docket". You are in bad faith trying to play a "beat the clock" game and this is unacceptable. Because you have failed to respond within thirty (30) days to the above-noted interrogatories and requests for production of documents, you have waived all objections. Now you need to respond with complete and thorough responses without any objections and with verifications forthwith. Regarding the interrogatories, respond truthfully; regarding the requests for production of documents: either provide the documents requested or respond by saying "no such documents exist". For your convenience, you are welcome to email me your responses and therefore you do not have to mail me a physical copy. Since you are dragging your feet, I can only give you until the 15th of November 2024 to provide the above-noted responses to my interrogatories and requests for production of documents. If I do not receive these responses by said date, I will file a motion to compel seeking any and all appropriate sanctions.

Truly,

/s/ Stewart Lucas Murrey
Dr. Stewart Lucas Murrey
Plaintiff & Plaintiff in Pro Per

Lucas

to me ▾

Wed, Nov 13, 10:24 PM



Dear Ms. Blalock,

I attach my second meet & confer letter to you regarding ongoing deficiencies of your discovery responses. Thanks,

--

Dr. Lucas Murrey

Ph.D Yale University

Author of Hölderlin's Dionysiac Poetry and Nietzsche: The Meaning of Earth

<https://sickoscoop.com/lucas>

<https://lucasmurrey.com>

On Nov 13, 2024, at 2:01 PM, Amy B <amyblalock@gmail.com> wrote:

Mr. Murrey,

Attached is an updated response letter.

Signed,

Amy Blalock

On Wed, Nov 13, 2024 at 1:07 PM Amy B <amyblalock@gmail.com> wrote:

Please see attached.

On Sun, Nov 10, 2024 at 6:07 PM servingpapers <servingpapers@protonmail.com> wrote:

Dear Ms. Blalock,

please see attached, thank you

Sent with Proton Mail secure email.

<Updated Response to Interrogatory and Discovery.pdf>

One attachment • Scanned by Gmail ⓘ





Amy B <amyblalock@gmail.com>
to servingpapers, 2 ▾

Wed, Nov 13, 2:01PM



Mr. Murrey,

Attached is an updated response letter.

Signed,
Amy Blalock

...

One attachment • Scanned by Gmail ⓘ



Amy B <amyblalock@gmail.com>
to servingpapers, 2 ▾

Fri, Nov 22, 6:12 PM (12 days ago)



Mr. Murrey -

I was able to complete and serve these as of yesterday, November 21st. Attached are copies with service papers.

Signed,
Amy Blalock

...

2 Attachments • Scanned by Gmail ⓘ



← Reply

↩ Reply all

➦ Forward



PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
13327 Van Nuys Blvd
Pacoima, CA 91331

A true and correct copy of the foregoing document entitled (*specify*): _____

~~DEFENDANT'S OPPOSITION TO PLAINTIFF DR. MURREY'S NOTICE AND MOTION TO COMPEL DEFENDANT~~
~~MS. BLALOCK'S RESPONSES TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS~~
~~AND REQUEST FOR SANCTIONS; AND DECLARATION OF AMY BLALOCK~~

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (*date*) 12/05/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Dr. Stewart Lucas Murrey
1217 Wilshire Blvd #3655
Santa Monica, CA 90403

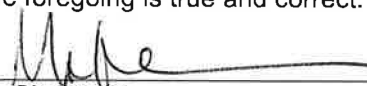
☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served)**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/05/2023 Michael Massmann
Date Printed Name


Signature